

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: BOSTON SCIENTIFIC CORP.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL No. 2326

THIS DOCUMENT RELATES TO ALL CASES

**DEFENDANT BOSTON SCIENTIFIC CORPORATION'S OBJECTIONS TO
PLAINTIFFS' FOURTH AMENDED NOTICE TO TAKE ORAL DEPOSITION OF
KATHLEEN FANTONI**

Defendant Boston Scientific Corporation ("Boston Scientific"), for its objections to Plaintiffs' Fourth Amended Notice to Take Oral Deposition of Kathleen Fantoni ("Notice of Deposition") [DKT No. 558], states as follows:

GENERAL OBJECTIONS

1. Boston Scientific objects to the "Definitions" in Plaintiffs' Fourth Amended Notice of Deposition to the extent they attempt to impose obligations on Boston Scientific other than those authorized by the Federal Rules of Civil Procedure, Local Rule of Civil Procedure 26.2, and/or any other applicable order of this Court.

2. Boston Scientific objects to the definition of "Mesh Product" to the extent that it includes any pelvic mesh products other than those identified in Paragraph 7 of Plaintiffs' Master Long Form Complaint [DKT No. 178], which are the only devices at issue in this litigation.

3. Boston Scientific objects to the definition of "Relevant Time Period" on grounds that it is not reasonably limited in time or scope with respect to the pelvic mesh products at issue in this litigation.

These General Objections are incorporated into each of the following objections to Plaintiffs' requests for production of documents identified in Exhibit A to Plaintiffs' Fourth Amended Notice of Deposition ("Requests for Production") [DKT No. 558-1]; shall be deemed continuing as to each Request for Production; and are not waived, or in any way limited by the following specific objections to Plaintiffs' Requests for Production. Boston Scientific reserves the right to assert additional objections to Plaintiffs' Fourth Amended Notice of Deposition.

OBJECTIONS TO PLAINTIFFS' REQUESTS TO PRODUCE

REQUEST NO. 1: Any and all documents, records, information or other material reviewed by you in preparation for deposition.

OBJECTION: Boston Scientific objects to Request No. 1 on grounds that this Request seeks documents and/or information that are protected by the attorney-client privilege and/or work-product doctrine.

REQUEST NO. 3: Any and all documents, records, information or other material, including but not limited to electronic data such as emails, shown to the deponent by Shook, Hardy & Bacon, LLP or any other lawyer, even if such documents are not in the deponent's possession, in preparation for this deposition, or other testimony worldwide relating to the Transvaginal Products.

OBJECTION: Boston Scientific objects to Request No. 3 on grounds that it is overly broad and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Boston Scientific also objects to the phrase "Transvaginal Products" in that it is not defined, is subject to multiple interpretations, and is therefore vague

and ambiguous. Boston Scientific further objects on grounds that this Request seeks documents and/or information that are protected by the attorney-client privilege and/or work-product doctrine.

Dated: October 18, 2013

Respectfully submitted,

By: /s/ Jon A. Strongman
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**COUNSEL FOR DEFENDANT
BOSTON SCIENTIFIC CORP.**

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CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2013 a true and correct copy of Defendant Boston Scientific Corporation's Objections to Plaintiffs' Fourth Amended Notice to Take Oral Deposition of Kathleen Fantoni was served via electronic mail on the following counsel of record:

Clayton A. Clark

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Dated: October 18, 2013

Respectfully submitted,

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